

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORIES OF ADVO, INC.
TO THE UNITED STATES POSTAL SERVICE
(ADVO/USPS-4-19)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to the United States Postal Service.

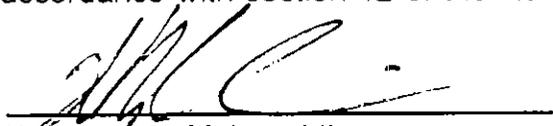
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Thomas W. McLaughlin

September 15, 1997

INTERROGATORIES OF ADVO INC. TO THE UNITED STATES POSTAL SERVICE

ADVO/USPS-4. Please provide the following in machine readable format (e.g., Lotus 123 or Excel):

- (a) FY96 third and fourth quarter billing determinants in a format similar to LR H-145.
- (b) FY97 first and second quarter billing determinants in a format similar to LR H-145.

ADVO/USPS-5. For FY94, 95 and 96, please provide the following for each city carrier route type:

- (a) Average number of possible deliveries.
- (b) Average daily volume per route or delivery.

ADVO/USPS-6. The DMM Quick Service Guide 630, defines a Standard non-automation letter as having the following dimensions:

- Minimum: 3-1/2 inches high, 5 inches long, and .007 inch thick.
- Maximum: 6-1/8 inches high, 11-1/2 inches long, and 0.25 inch thick.

Please confirm the following or provide the correct dimensions:

- (a) These are the dimensions for the ECR letter rate categories.
- (b) These are the letter dimensions for the IOCS data collection.

ADVO/USPS-7. The DMM Quick Service Guide 643 defines ECR non-letters and flats as having the following dimensions:

- Minimum: more than 6-1/8 inches high, or 11-1/2 inches long, or 0.25 inch thick.
- Maximum: 11-3/4 inches high, 14 inches long, and 0.75 inch thick.

Please confirm the following or provide the correct dimensions:

- (a) These are the dimensions for the ECR non-letter rate categories.
- (b) These are the flat dimensions for the IOCS data collection.

ADVO/USPS-8. Please provide the dimensions for purposes of rate categories and billing determinants for following:

- (a) ECR flats.
- (b) ECR non-letters, non-flats.

ADVO/USPS-9. Does the USPS accept ECR mail that is less than the DMM letter minimums? If so, please describe such mail and explain how it is classified for purposes of (a) shape and rate categories/billing determinants, and (b) IOCS data collection.

ADVO/USPS-10. Please confirm the following or explain fully why you cannot:

- (a) DMM-defined flats are sometimes cased by city carriers into letter cases.
- (b) DMM-defined letters are sometimes cased by city carriers into flat cases.
- (c) DMM-defined parcels are sometimes cased by city carriers into flat cases.

ADVO/USPS-11. USPS Handbook F-56 (Rural Carrier Route Test Instructions) states that letter-shape mail is anything 5 inches or less wide and 3/8 inch or less thick, and flat-shape mail is any mailpiece that exceeds the 5-inch maximum width of a letter. With respect to the Handbook and the rural CCS, please explain the following:

- (a) Does the Special Count of Mail identify as a letter anything 5 inches or less high, or does it also require that the piece be equal to or less than .375 inch thick? Please explain.
- (b) What shape is assigned to mail that less than 5 inches long (and less than 5 inches high/less than .375 inch thick) categorized?
- (c) What shape is assigned to mail that is less than 5 inches high but more than .375 inch thick?

ADVO/USPS-12. USPS Handbook F-56 (Rural Carrier Route Test Instructions) states that flat mail is any mailpiece that exceeds the 5-inch maximum width (height), and parcel mail is any article that exceeds any one of the following dimensions: 5 inches high, 18 inches long, and 1-9/16 inches wide. The Handbook appears to define flats as anything exceeding the 5-inch height maximum for letters and to define parcels (under one definition) as any article that exceeds the 5-inch height dimension.

- (a) Please explain fully how flats and parcels are distinguished from each other for purposes of the rural carrier CCS.

- (b) What shape is assigned to mail that is 5.1 inches high, 6 inches long, and .375 thick?

ADVO/USPS-13. What are the dimensions for letters, flats, and parcels for purposes of the rural carrier Special Mail Count? Please provide some examples to clarify the differences.

ADVO/USPS-14. Witness Hume's Worksheet R shows total adjusted letter volume of 17,009,241.2 and total adjusted flat volume of 15,242,494.8. However, LR-H-193 shows total adjusted letter volume of 19,105,377 and total adjusted flat volume of 13,146,349. Please explain the differences in adjusted letter and adjusted flat volumes for Hume worksheet R and p. 9 of LR H-193.

ADVO/USPS-15. Please confirm that the LR H-193 adjusted letter and flat volumes are used to distribute the rural carrier letter and flat costs. If this is incorrect, please provide the correct volumes and identify their source.

ADVO/USPS-16. Please provide the correct adjusted Rural CCS volumes for parcels and boxholders that were used as the distribution key for volume-variable rural carrier costs (Alexandrovich Cost Segment 10 worksheets).

ADVO/USPS-17. Please confirm that the rural CCS volumes were collected as described in LRs H-25 (Handbook F-55) and H-89 (Rural CCS). If not please explain why not and provide a description of how they were collected and all documentation related to that collection process.

ADVO/USPS-18. Referring to the National Mail Count data from LR H-192, please provide the following:

- (a) The specific dates of the data collection.
- (b) The proportion of evaluated routes that participated in the count.
- (c) The proportion of other routes that participated in the count.
- (d) A description of how evaluated and other routes were chosen to participate in the count.

ADVO/USPS-19. LR H-193, p. 2, states that the rural mail count and the rural carrier cost system (CCS) do not count flats in exactly the same way. Please explain fully how

each of the following is counted in the rural mail count and explain fully why its CCS volume must be adjusted:

- (a) Flats
- (b) Letters